REMARKS

Claims 3-10 are pending in the present application. All of these claims stand rejected. The Applicant requests reconsideration of the rejections of these claims based on the following remarks.

Claims 3-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Thompson et al. (U.S. Patent No. 5,335,276) in view of Stern (Publication WO97/14222). The Applicant respectfully traverses this rejection based on the following reasons.

With respect to claim 3, the Office Action asserts that Thompson discloses all of the features of claim 3 except for an interface with which a call-answering functionality is enabled by the microcontroller in combination with the digital voice memory. While agreeing that Thompson does not disclose the interface having the features of claim 3, other elements of claim 3 are also not specifically taught or suggested by Thompson. In particular, as also argued in the Applicant's previous response, the memories 84 and 284 shown in the embodiments of Figures 7 and 8 of Thompson, respectively, are merely taught to contain resident applications in core software programs associated with either a handheld communication device 50 or a desktop telephone 150 (see col. 10, ll. 60-62). No teaching or suggestion is given by Thompson that either of the memories 84, 284 interface with an integrated circuit with which "a call-answering functionality is enabled by the microcontroller in combination with the digital voice memory" as featured in claim 3.

Additionally, the Office Action asserts that Thompson teaches a radio-cell specific logic module, although no particular element has been identified in Thompson to correlate with this claimed element. Instead, the Office Action references large sections of Thompson (e.g., col. 4, line 12-col. 5, line 68; and col. 10, line 46-col. 11, line 12). Although the Office Action has not specifically made clear where Thompson teaches the claimed feature, at least one of the referenced sections (i.e., col. 4, line 12-col. 5, line 68) appears to refer to the application module, which is denoted with reference number 100 in Figs. 6, 7, 8, and 10. If this is the case, then there exists a contradiction in the rejection because the application module 100 is also correlated to the claimed "interface". On the other hand, if this is not the intent in the present Office Action, the present rejection is then unclear as to what element or elements are being asserted as correlative to the claimed radio-cell specific logic module.

Additionally, as pointed out in the Applicant's previous response, a call-answering functionality is not disclosed by Thompson as one of the provided applications. Further, none of the memories disclosed by Thompson are digital voice memories but, rather, store programs for the execution of base and application programs in the cases of resident memories 84 or 284 (see col. 11, ll. 27-37).

Of the features of claim 3 that are missing from Thompson as enumerated above, Stern does not teach or suggest these features. Accordingly, the Applicant submits that the rejection of claim 3 has not established that all of the elements are taught by the cited references, either taken alone or combined.

The Office Action further asserts that Stern teaches a personal voice server system comprising highly integrated voice chip, flash memory coupled to the voice chip, and a control software operating a control processor in the voice chip. The Office Action then asserts that this device, which is portable, affords a user the ability to record, edit, play and review voice messages. Additionally, a removable memory card 14 is disclosed. Apparently based on the teaching of these features in Stern, the Office Action concludes that it would have been obvious to apply the teachings of Stern to the system of Thompson in order to "facilitate high speed transmission of voice messages." The Applicant respectfully disagrees with these assertions and submits that one of ordinary skill in the art would not have been motivated to apply the teachings of Stern to Thompson for any reason.

Specifically, Stern teaches a personal voice server system 10 as illustrated in Fig. 1. In such a system, a user of the system may record voice messages to the flash memory 14 from which the memory may be recalled and sent to a remote voice processing or interactive voice response host computer over a communication link. Additionally, voice messages may be received from the interactive voice response host computer. These functions, however, are not the same as a call-answering functionality as featured in claim 3. Rather, the device and techniques of Stern merely allow a user of the personal voice system to record and edit a voice message that is then sent to a computer over a communication line or simply receive messages from the interactive voice response host computer. Thus, Stern fails to teach the purported single element missing from Thompson; namely an interface to a digital voice memory with which a call-answering functionality is enabled by the microcontroller in combination with the digital voice memory. Accordingly, even if one of ordinary skill in the art were to combine the

teachings of Stern with Thompson, all the elements of claim 3 would not be met by the combination. Accordingly, the Applicant respectfully submits that the combination of Thompson and Stern does not render the features of claim 3 obvious and requests that the rejection be withdrawn, accordingly.

With respect to dependent claims 4-6, these claims are believed to be allowable at least by virtue of their dependency on independent claim 3.

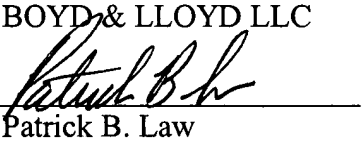
With respect to independent claim 7, the Applicant respectfully submits that this claim is allowable for at least the reasons presented above with respect to claim 3.

Dependent claims 8-10 are also submitted to be allowable at least by virtue of their dependency on independent claim 7.

In light of the foregoing comments, the Applicant respectfully submits that claims 3-10 are allowable over the prior art of record and request that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

BELL, BOYD & LLOYD LLC

BY 

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